

Pro Se I (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Norfolk Division

Jacob Queern, Principal, JEQ&amp;Co

Plaintiff(s)

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

1. Defense Logistics Agency (DLA)  
2. Small Business Administration (SBA)  
See Thumbdrive--> Exhibits --> Additional  
Defendants --> Additional Defendants.pdf

Defendant(s)

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Case No. 2:19cv485

*(to be filled in by the Clerk's Office)*Jury Trial: (check one) ☒ Yes ☐ No

## PROPOSED AMENDED COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Jacob Queern, Principal, JEQ&Co
Street Address	7761 NC HW 87 S
City and County	Fayetteville, Cumberland
State and Zip Code	NC, 28306
Telephone Number	(757)633-1206
E-mail Address	iqueern@jeqandco.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

## Defendant No. 1

Name	William Barr
Job or Title <i>(if known)</i>	Attorney General of the United States
Street Address	Main Justice Building
City and County	10 <sup>th</sup> & Constitution Ave, NW
State and Zip Code	Washington, DC 20530
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 2

Name	United States Attorney for the Eastern District of Virginia
Job or Title <i>(if known)</i>	Norfolk Division Office
Street Address	101 W Main St, #8000
City and County	Norfolk
State and Zip Code	VA 23510
Telephone Number	+1(757)441-3040
E-mail Address <i>(if known)</i>	Laura.Grimes@usdoj.gov

## Defendant No. 3

Name	GAO; Jonathan Kang
Job or Title <i>(if known)</i>	GAO Attorney
Street Address	441 G. St., NW
City and County	Washington D.C
State and Zip Code	DC 20548
Telephone Number	(202)512-3315
E-mail Address <i>(if known)</i>	KangJ@gao.gov

## Defendant No. 4

Name	See Thumb drive --> Exhibits --> Additional Defendants -->
Job or Title <i>(if known)</i>	Additional Defendants.pdf
Street Address	
City and County	
State and Zip Code	
Telephone Number	

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E-mail Address (if known) \_\_\_\_\_

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Amendment 1 to the US Constitution: "...petition the Government for a redress of grievances"

~~FAR(s): §13.106-2, §52.219-3, §19.306(e)~~

The bid protest provisions of the Competition in Contracting Act of 1984, 31 U.S.C. §§ 3551-3556.

4 C.F.R. 21.5(b)(1)(2)

18 USC(s): §1001; §371; Chapter 73: §1505; §1512 (a)(2)(A), (a)(2)(C), (b)(1), (c)(1)(2); §1513(e); §1516

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) \_\_\_\_\_, is a citizen of the  
State of (name) \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated  
under the laws of the State of (name) \_\_\_\_\_,  
and has its principal place of business in the State of (name) \_\_\_\_\_.

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*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. ~~The Amount in Controversy~~

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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Find enclosed

1. Thumb drive received by the court on September 9, 2019. Containing copious exhibits substantiating allegations herein:

- a. Exhibits --> Motion for leave --> Motion for Leave pursuant to local civil rule 7(F)(3).pdf
- b. Exhibits --> Additional Defendants --> Additional Defendants.pdf
- c. Exhibits --> Financial Disclosure pursuant to Local Civil Rule 7.1 --> Financial Disclosure pursuant to Local Civil Rule 7.pdf
- d. Exhibits --> Local Rule83-1MPROSECERTIFICATION, ghost writing --> Rule83-1MPROSECERTIFICATION ghost writing cert.pdf
- e. Exhibits --> Petition --> Petition to the Court pursuant to 28 U.S.C. §2679 (d)(3).pdf
- f. Exhibits --> forma pauperis --> APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS.pdf
- g. Exhibits --> Claim(s) FOR Relief pursuant to FRCP Rule 8.1 --> Claim(s) FOR Relief pursuant to FRCP Rule 8.1

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#### **IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Find enclosed thumbdrive.

Exhibits --> Claim(s) FOR Relief pursuant to FRCP Rule 8.1 --> Claim(s) FOR Relief pursuant to FRCP Rule 8.1 --> p. 36 - 39

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 09/24/2019

Signature of Plaintiff

Printed Name of Plaintiff

  
 Jacob Queem, Principal, JEQ&Co LLC
**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_